

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

TONY and DOROTHY TURNER,

Plaintiffs,

v.

**AMERICAN INTERNATIONAL
GROUP, INC.; et al.**

Defendants.

CIVIL ACTION NO. 3:05-CV-00753

AFFIDAVIT OF KATHIE ROWELL

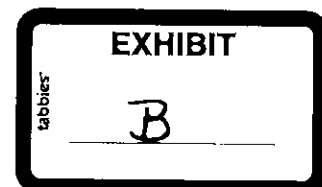
Kathie Rowell, under oath, states as follows:

1. My name is Kathie Rowell. The statements made in this declaration are based upon my own personal knowledge as more specifically set forth below and, if sworn as a witness, I could testify competently to them.

2. I worked for American General Financial Services, Inc. ("AGFS"), formerly known as American General Finance, Inc., for approximately thirty years until I had to leave American General due to illness in or around October, 1999.

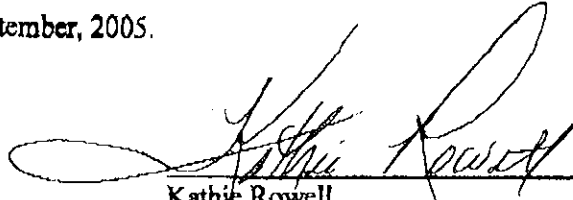
3. At no time did I ever tell any customer, including Tony and Dorothy Turner, that credit insurance was required, that credit insurance would improve the customer's chances of obtaining a loan, or that credit insurance would improve a customer's credit score.

4. I was not aware until counsel for AGFS contacted me that I had been named as a defendant in this lawsuit. I have never received a copy of a summons and complaint for this lawsuit.

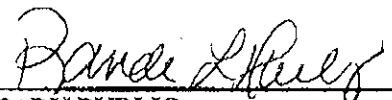


FURTHER AFFIANT SAYETH NOT.

This the 12 day of September, 2005.


Kathie Rowell

SWORN TO AND SUBSCRIBED BEFORE ME, this the 12 day of September,
2005.


NOTARY PUBLIC

My Commission Expires:
NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: Oct 2, 2009
BONDED THRU NOTARY PUBLIC UNDERWRITERS

